

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

REM WRANSKY,)	CASE NO. 1:22-CV-01417
)	
Plaintiff,)	
)	JUDGE PAMELA A. BARKER
v.)	
)	
THE MUSICAL ARTS)	
ASSOCIATION)	
d/b/a The Cleveland Orchestra, et al.,)	
)	
Defendants.)	

**DEFENDANT THE MUSICAL ARTS ASSOCIATION, D/B/A THE CLEVELAND
ORCHESTRA'S UNOPPOSED MOTION FOR EXTENSION OF TIME
TO RESPOND TO THE COMPLAINT**

Defendant The Musical Arts Association, d/b/a The Cleveland Orchestra (“Musical Arts”) hereby moves for an extension of time up to and including September 21, 2022 in which to answer, move, or otherwise respond to the Complaint in this action. Counsel for Musical Arts was recently retained and is still investigating the allegations of the Complaint.

Counsel for Plaintiff Rem Wransky has consented to the requested extension via email on September 6, 2022. No prior extension has been granted by the Court or sought by Musical Arts, and this Motion is not filed for purposes of delay and is submitted in good faith.

Dated: September 7, 2022

Respectfully submitted,

/s/ Nancy M. Barnes,

Nancy M. Barnes (#0074744)
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/s/ J. Timothy McDonald

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Pro Hac Vice Admission To Be Sought

CERTIFICATE OF SERVICE

I hereby certify that I electronically filed the foregoing with the Clerk of the Court on September 7, 2022, using the CM/ECF system, which will send notification of such filing to all CM/ECF participants. Parties may access this filing through the Court's system.

/s/ Nancy M. Barnes

Nancy M. Barnes (#0074744)
Counsel for Defendant
The Musical Arts Association,
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